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June 25, 2021

Via ECF

Honorable Mary Kay Vyskocil United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007-1312

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Letter Motion Request to File Medical Documents Under Seal

Re: Index No. 20-04008 (MKV)

AN Frieda Diamonds, Inc. v. Roni Rubinov and New Liberty Pawn Shop, Inc.

Dear Judge Vyskocil:

In support of with the undersigned's Letter Motion Request to Expedite Review of Appeal of this date, pursuant to the Court's Individual Rules of Practice in Civil Cases, I am writing at the request of Mr. Rubinov to file three medical documents under seal, dated February 25, 2021, March 21, 2021 and June 14, 2012. Upon request, the Bankruptcy Court has already ordered the first two letters sealed. The orders are enclosed. Request for the third letter to be filed under seal is pending decision by the Bankruptcy Court.

The request is narrowly tailored to just the private medical records of Mr. Rubinov, in support of his Letter Motion Request to Expedite Review of Appeal. Medical records are sensitive and are properly filed under seal. Please see <u>Bauman v Harbor View Home Owners Assn.</u>, 16CV2506-MMA (JMA), 2017 WL 1378215, at *1 [SD Cal Apr. 11, 2017].

For the foregoing reasons, it is respectfully requested that the Court grant Mr. Rubinov's request to file the three medical documents under seal. Thank you in advance for your consideration.

Very truly yours

/s/ Akiva Shapiro

Akiva Shapiro, Esq.

Encls.

cc. Leo Fox, Esq. via ECF

The Court GRANTS Appellants' request to file Mr. Rubinov's medical records under seal. The Clerk of Court is respectfully requested to maintain docket entry 24 under seal and terminate docket entry 23. SO ORDERED.

Date: 7/1/2021

New York, New York

Mary Kay Wskocil

Jnited States District Judge